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The Defendants, acting in concert and/or individually, caused Hagopian to be served with a “No Trespass Order” in order to restrict Hagopian from exercising his rights to free speech and to retaliate against him for having criticized MMA from time to time in writing and at public forums. Using the No Trespass Order issued by Slattery as Chief of Police of MMA, the Defendants have restricted Hagopian from having any access to any functions or any physical presence at MMA, a public institution, or to be able to express his viewpoints relating to questionable policies followed by MMA. The No Trespass Order is being used as a prior restraint on Hagopian’s rights to free speech and liberty and was issued as a means to threaten, coerce and/or intimidate Hagopian by subjecting Hagopian to immediate arrest and/or fines.

As explained in the Affidavit of Jeffrey Hagopian, filed herewith, the Defendants have refused to revoke the No Trespass Order, failed to provide Hagopian with any right to a hearing to challenge the actions taken against him, endorsed and/or assisted Slattery in the issuance of the No Trespass Order knowing that Slattery did not conduct a fair investigation, never interviewed Hagopian about the underlying events, and turned a blind eye to Hagopian’s separate request that action be taken against MMA Board of Trustees Member Geoffrey Wilkinson for threatening Hagopian while on MMA property. The No Trespass Order threatens Hagopian with immediate arrest and/or risk of criminal fines if he appeared on any of MMA’s land, buildings, ships or vessels. The No Trespass Order was issued in retaliation for Hagopian’s exercise of his right to freedom of expression and other constitutionally protected rights.

Hagopian incorporates by reference herein his Memorandum of Law in support of this Application, being filed simultaneously herewith.

**WHEREFORE**, Hagopian prays that this Court:

- (a) grant a hearing on Hagopian's application for a preliminary injunction under each Count of this Complaint;
- (b) after a hearing, issue a preliminary injunction order prohibiting the Defendants from any enforcement of the No Trespass Order until such time as there is a trial on the merits of this case; and
- (c) grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

**JEFFREY B. HAGOPIAN**

By its attorneys,

/s/ Douglas E. Hausler

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